

Customer Vulnerability

August 2023

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Introduction

Marston Holdings Limited (“Marston”) is committed to securing the best outcomes for customers in vulnerable situations. Marston’s approach to vulnerability upholds our values of respect, transparency, professionalism, and accountability.

Our ethical approach to vulnerability is embedded across all areas of Marston. All office and field-based staff within Marston Recovery and Engage are trained to sensitively assess vulnerability and establish when a customer is in need of support so that we can deliver the highest standards of customer care.

This document sets out our approach to identifying and supporting vulnerable customers through any process that we undertake for our clients.

Definition

A vulnerable customer is someone who, due to their personal circumstances, is especially susceptible to detriment, particularly if an organisation is not acting with appropriate levels of care.

There are different types of vulnerability, each unique to an individual and many triggers that can cause a vulnerable situation, however temporary in nature.

Vulnerability cannot be assessed through a predictive list as each case is different from another due to complexities that can include severity of condition, how much assistance a customer may have, impact on financial stability, duration and how often the episodes occur.

Some examples of situations or conditions that could cause a customer to be vulnerable depending on their specific circumstances include:

- Alzheimer’s / Dementia
- Asylum seeker under immigration
- Blindness, Deafness
- Brain damage
- Cancer
- Difficulty in understanding, speaking, or reading English
- Domestic Violence
- Drugs / alcohol misuse
- Employment Support Allowance (mental health related)
- Gambling

- Heart Problems
- Memory loss
- Mental Health, including Bipolar and post-natal depression
- Pregnancy with a medical condition
- Recent bereavement (immediate family up to 6 months)
- Rehabilitation Centre in-house
- Schizophrenia, Agoraphobia, ADHD, Autistic, Asperger's
- Sectioned under the Mental Health Act or inpatient in Mental Health Unit
- Single parent families
- The elderly
- Unemployed people
- Young people

Approach

Our approach to vulnerability is in line with the advice and guidance provided by the Taking Control of Goods: National Standards [here](#) and the Civil Enforcement Association code of practice [here](#).

We take our responsibility to all of our customers seriously and seek to ensure that people are treated with fairness and respect. Identifying vulnerability early demonstrates greater care, support, and fairness to customers.

Our specialist support teams apply a holistic approach based on a customer's individual circumstances and it may be necessary to ask for documents and information to help us, but this is only with a view to ensuring a fair outcome is achieved and to support discussions with the creditor.

Should a vulnerable customer want to make a payment, a payment plan is only considered where it is appropriate to do so, ensuring no further distress or disadvantage to the customer. Our support teams will check that the customer fully understands the implications of making the payment and carry out affordability checks. They will discuss a payment plan that suits both the vulnerable customer and the creditor.

If you are struggling, it is important you contact us as soon as possible so that we can provide the right support at the earliest opportunity.

Reasonable adjustments

Marston recognises that some customers we come into contact with will be vulnerable in the context of how we interact with them, by virtue of their personal circumstances. We have a duty and obligation to ensure that all elements of our work are consistent with our values, and

that we make reasonable adjustments and put in place appropriate additional support mechanisms to take account of these needs and to ensure customers are not at risk of undue detriment.

We have in place a range of services and processes to support customers. Some of these are aimed at people with disabilities who may well not be vulnerable, but form part of our wider suite of support for customers who need us to do things a little differently.

Whilst many customers who need reasonable adjustments will not be vulnerable, we recognise that for some customers a disability such as being blind means we need to communicate with that customer in a different way. This may include providing communication in large print, Braille, or audio format.

We recognise that a language barrier, particularly when combined with other factors such as age or social isolation, may lead to individuals being potentially vulnerable. Marston offers a number of language resources such as, a translation or interpretation service. Our website complies with accessibility guidelines to provide equal access and equal opportunity to people with diverse abilities.

Vulnerability support

A vulnerable customer may be referred to one of our specialist support teams from field agents, through our Customer Contact Centres, by our correspondence teams, through debt advice organisations, MPs or directly by our clients.

Where vulnerability is identified by a contact centre agent or field agent, they are trained to use specialist techniques to gain a better understanding of the vulnerability and any limitations in a customer's mental capacity to assist a referral to one of our specialist support teams.

Sometimes we may come into contact with customers who are at immediate risk of harm, either to themselves or from others therefore procedures are in place to deal with this. Whilst such cases are very rare, consequences can be serious, and Marston will ensure it takes appropriate steps to mitigate the risk of harm. Our staff and field agents are trained to seek the support of the emergency services or other third-party organisations should this be required.

To assist a referral to our welfare support team, we will gather and process sensitive information appropriately with the customer's explicit consent and ask for a telephone number to help the welfare support team with all future communication. The case is protected whilst the vulnerability is being assessed and until a decision on how to proceed is made.

We understand a customer may not feel comfortable talking about their vulnerability so the welfare support officer will take the time to explain our vulnerability procedure in more detail and provide their name and direct contact information for the customer or an authorised third party. They will explain how the case(s) will be handled by the welfare support team based on the customer's specific circumstances.

Our specialist support teams will ensure each case is managed in the most helpful, supportive, and empathic way ensuring customers are not disadvantaged because of their personal circumstances. They will begin to build trust with the customer who, in many cases, may not feel comfortable talking about their vulnerability.

Close collaboration with our clients and the advice sector enables us to provide the best support to our vulnerable customers. We encourage customers to seek the appropriate help for their situation and we assist customers in understanding their rights and provide them with the tools to manage their debt including referrals to free and independent advice, or to local support groups who may be able to help with their unique vulnerability.

Where a short to mid-term vulnerability is identified, a regular contact schedule will be proposed to maintain continuity with the customer. This is so that we can provide further support, monitor for signs of worsening vulnerability or contact, and signpost, as necessary.

We will do all we can to make this process as simple and as helpful as possible. Our welfare support team will provide tailored individual support throughout the time a customer is with them. This support may continue long after their case is concluded to provide essential assistance to help a customer through difficult situations or longer-term vulnerability.

Signposting

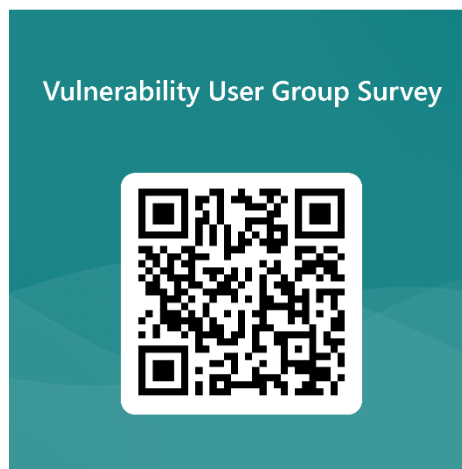
The welfare support team works closely with the advice sector and actively seeks to identify any relevant signposting to support a customer's unique vulnerability. The welfare support team will provide dedicated telephone numbers and information to customers who wish to speak to one or more charities. They include but are not limited to:

- The Samaritans
- Money Advice Service
- National Debtline
- Citizen's Advice Bureau
- StepChange
- Advice UK

Marston's welfare support team understand that a customer may raise multiple vulnerabilities but will ensure that they identify and clarify which of these is being considered for further support.

Vulnerability Survey

We commit to continuous improvement through feedback and learning, seeking opportunities to enhance our inclusive service delivery in the support we provide to vulnerable customers. Your feedback helps us to improve the customer experience. Please scan the QR code below to access our vulnerability survey or go to <https://forms.office.com/e/nhd1cax4kF>.



External References:

- Taking Control of Goods: National Standards – click [here](#)
- Civil Enforcement Association code of practice – click [here](#)
- High Court Enforcement Officers Association best practice guide – click [here](#)
- gov.uk – click [here](#)
- Citizens Advice – click [here](#)
- AdviceUK – click [here](#)
- Money Advice Service – click [here](#)
- StepChange Debt Charity – click [here](#)
- National Debtline – click [here](#)
- Christians Against Poverty – click [here](#)